



A FAMILY COMPANY

S. C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236
262.260.2000

January 30, 2006

Mr. Adam Heyward
Document Processing Desk (APPL)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 South Bell Street
Arlington, Virginia 22202

Dear Mr. Heyward:

**Subject: Application for Pesticide Registration
Phab (EPA File Symbol 4822-____)**

Note: Phab (also referred to as Phab 1, Phab 3, Phab 5, Phab 6 and Phab 7) contains L-Lactic Acid - referred to in some studies as Lactic Acid - as the active ingredient.

The undersigned, S. C. JOHNSON & SON, INC., does hereby make application to register a new pesticide product, Phab, a limited disinfectant, hard surface sanitizer and virucide. The active ingredient is L-lactic acid.

In addition to the basic formulation, we are seeking approval of four alternate formulas containing different fragrance-dye combinations. The acute toxicity studies and the primary efficacy studies were done on the basic formulation (Formula 37456B; Phab 1) and confirmatory efficacy tests were conducted on the alternate formulations [Formulas 37460A (Phab 3), 38403A (Phab 5), 38823A (Phab 6) and 38824A (Phab 7)]. Disclosure of the confidential components of the three fragrances is enclosed in a sealed envelope from the supplier. The dye manufacturer will send disclosure of the colorant components to you on our behalf as soon as we know the appropriate EPA File Symbol Number for this submission.

Submitted herewith to satisfy the respective guideline requirements are three separately bound copies of each of the following documents:

<u>Guideline Number</u>	<u>Study Number</u>	<u>Title of Study</u>
830.1550 - 830.1800	N/A	Product Chemistry Data for Phab 1, Formula Number 16520H53-1

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	<u>Guideline Number</u>	<u>Study Number</u>	<u>Title of Study</u>
46750402	830.6302 - 830.7950	532A2	Physical and Chemical Characteristics of Phab 1 Formula Number 16520H53-1
46750403	870.1100	RZB00053	An Acute Oral Toxicity Study in Rats with Phab 1 (Up/Down Study Design) (SCJ Notebook No. 16520H53-1)
46750404	870.1200	RZB00054	An Acute Dermal Toxicity Study in Rabbits with Phab 1 (SCJ Notebook No. 16520H53-1)
46750405	870.1300	RZB00055	An Acute Nose-Only Inhalation Toxicity Study in Rats with Phab 1 (SCJ Notebook No. 16520H53-1)
46750406	870.2400	RZB00056	A Primary Eye Irritation Study in Rabbits with Phab 1 (SCJ Notebook No. 16520H53-1)
46750407	870.2500	RZB00057	A Primary Skin Irritation Study in Rabbits with Phab 1 (SCJ Notebook No. 16520H53-1)
46750408	870.2600	RZB00058	A Dermal Sensitization Study in Guinea Pigs with Phab 1 - Modified Buehler Design (SCJ Notebook No. 16520H53-1)
46750409	91-2 (c)	A03391	AOAC Germicidal Spray Method – <i>Salmonella choleraesuis</i> (ATCC 10708)
46750410	91-2 (f)	A03458	Virucidal Efficacy of a Disinfectant for Use on Inanimate Environmental Surfaces – Influenza A virus
46750411	91-2 (f)	A03459	Virucidal Efficacy of a Disinfectant for Use on Inanimate Environmental Surfaces – Herpes simplex virus type 1
46750412	91-2 (f)	A03460	Virucidal Efficacy of a Disinfectant for Use on Inanimate Environmental Surfaces – Herpes simplex virus type 2
46750413	91-2 (f)	A03461	Virucidal Efficacy of a Disinfectant for Use on Inanimate Environmental Surfaces – Rhinovirus type 37
46750414	91-2 (f)	A03462	Virucidal Efficacy of a Disinfectant for Use on Inanimate Environmental Surfaces – Rotavirus

<u>Guideline Number</u>	<u>Study Number</u>	<u>Title of Study</u>
46750415 91-2 (i)	A03393	AOAC Germicidal Spray Method – <i>Escherichia coli</i> (ATCC 11229), <i>Enterobacter aerogenes</i> (ATCC 13048)
46750416 91-2 (j)	A03508	Standard Test Method for Efficacy of Sanitizers Recommended for Inanimate Non-Food Contact Surfaces (Modification for Spray Product Application) – <i>Listeria monocytogenes</i> (ATCC 15313), <i>Streptococcus pyogenes</i> (ATCC 19615)
46750417 91-2 (j)	A03513	Standard Test Method for Efficacy of Sanitizers Recommended for Inanimate Non-Food Contact Surfaces (Modification for Spray Product Application) – <i>Staphylococcus aureus</i> (ATCC 6538), <i>Klebsiella pneumoniae</i> (ATCC 4352)
46750418 91-2 (j)	A03514	Standard Test Method for Efficacy of Sanitizers Recommended for Inanimate Non-Food Contact Surfaces (Modification for Spray Product Application) – <i>Staphylococcus aureus</i> (ATCC 6538), <i>Klebsiella pneumoniae</i> (ATCC 4352) (Phab 3)
46750419 91-2 (j)	A03535	Standard Test Method for Efficacy of Sanitizers Recommended for Inanimate Non-Food Contact Surfaces (Modification for Spray Product Application) – <i>Staphylococcus aureus</i> (ATCC 6538), <i>Klebsiella pneumoniae</i> (ATCC 4352) (Phab 6)
46750420 91-2 (j)	A03536	Standard Test Method for Efficacy of Sanitizers Recommended for Inanimate Non-Food Contact Surfaces (Modification for Spray Product Application) – <i>Staphylococcus aureus</i> (ATCC 6538), <i>Klebsiella pneumoniae</i> (ATCC 4352) (Phab 5)
46750421 91-3 (f)	A03394	AOAC Germicidal Spray Method – <i>Salmonella choleraesuis</i> (ATCC 10708) (Phab 3)
91-3 (f) 46750422	A03463	AOAC Germicidal Spray Method – <i>Salmonella choleraesuis</i> (ATCC 10708) (Phab 5)

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	<u>Guideline Number</u>	<u>Study Number</u>	<u>Title of Study</u>
46750423	91-3 (f)	A03464	AOAC Germicidal Spray Method – <i>Salmonella choleraesuis</i> (ATCC 10708) (Phab 6)
46750424	91-3 (f)	A03465	AOAC Germicidal Spray Method – <i>Salmonella choleraesuis</i> (ATCC 10708) (Phab 7)

Also enclosed are the following administrative documents in support of the registration of Phab:

- 1) Application for Pesticide Registration (EPA Form 8570-1);
- 2) Confidential Statements of Formula, a basic and four (4) alternates;
- 3) Formulator's Exemption Statement (EPA Form 8570-27);
- 4) Five copies of the proposed product label;
- 5) Certification with Respect to Citation of Data (EPA Form 8570-34);
- 6) Data Matrix; and
- 7) Disclosure of components for three fragrances.

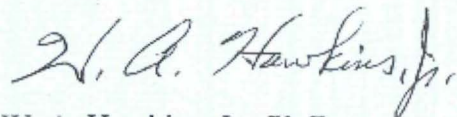
We believe that this submission falls under PRIA fee category A54 with a fee of \$4,200.

We trust that the Agency will find this application to register Phab to be complete and acceptable.

If you have any questions or need additional information, please contact me at (262) 260-0619 or by e-mail at wahawkin@scj.com.

Sincerely,

S. C. Johnson & Son, Inc.



W. A. Hawkins, Jr., Ph.D.
Registration Specialist II

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